

WEST TAVAPUTS PLATEAU NATURAL GAS FULL FIELD DEVELOPMENT PROPOSAL - PUBLIC SCOPING COMMENT SUMMARY (as of 07/26/06)

Sheet 1 of this Excel spreadsheet summarizes the public opinions and comments received by the BLM during the scoping period for the West Tavaputs Natural Gas Full Field Development Proposal Environmental Impact Statement. Sheet 1 of this spreadsheet is organized by subject matter of the public opinion / comment received. Sheet 2 of this spreadsheet summarizes the numbers of comment letters received by BLM. The purpose of this document is to disclose public comments and opinions received by the BLM during the scoping period.

Subject Matter	Comment
Agriculture	Dust and magnesium chloride will affect agriculture in Nine Mile Canyon
Air Quality	Air quality will be negatively impacted from the development
Air Quality	Dust will increase
Air Quality	Current requirements for dust suppression are not being met by BBC, and will likely not be met in the future
Air Quality	Massive dust suppression will be needed and will impact air quality
Air Quality	Odors will impact the area
Air Quality	Dust suppression efforts thus far in the Canyon have been ineffective
Air Quality	Baseline measurements need to be done on the air quality away from the road and next to the road
Air Quality	An analysis needs to be done on potential particulate concentrations and potential health effects from dust
Air Quality	Need to address the details of diesel exhaust and its health impacts
Air Quality	Air quality standards violations are very obvious, given the concentration of dust particles on the adjacent landscape
Air Quality	Fugitive dust and improper application of Mag-Chloride and Mag-Chloride laden dust are of concern.
Air Quality	What monitoring has been done by BBC or BLM and what will be required to determine the long term effects of dust on riparian habitat, crop lands, and cultural sites? A scientific study is needed
Air Quality	Concern regarding raw diesel fuel and associated additives emitted through the use of Jake brake exhaust systems
Air Quality	The effects of air quality on all species as well as humans should be examined
Air Quality	Fugitive dust increases actual disturbed acres due to the high concentrations being created
Air Quality	The combination of alkaline and Mag-Chloride laden dust is covering the landscape for several hundred feet on both sides of the road in places
Air Quality	BLM must ensure that this project would conform to all applicable air quality laws and standards, including regional haze rules. This necessitates that the agency monitor air quality for the project area
Air Quality	How will the agency ensure that proper dust suppression techniques are being followed?
Air Quality	Parks both from the project and cumulatively
Air Quality	Show that this project will not adversely affect the Utah Regional Haze State Implementation Program
Air Quality	Current air quality conditions should be studied and presented in the EIS
Air Quality	National Ambient Air Quality Standards, Prevention of Significant Deterioration Increments, and quality-related values in Class 1 areas should be addressed

Subject Matter	Comment
Air Quality	Exceeding PM-10 levels is a concern because of road dust emissions
Air Quality	Dispersion modeling should be completed
Air Quality	Technologies that reduce air emissions, venting and flaring, should be considered
Alternatives	Lands with Wilderness characteristics should not be approved for drilling
Alternatives	Identify former WIA lands and protect them under the same policies as WSAs.
Alternatives	Re-route roads out of Nine Mile Canyon and other canyons with rock art
Alternatives	Consider and analyze an alternative that designates Desolation and Jack Canyon as Wilderness Study Areas
Alternatives	An alternative that disallows drilling WIAs and WSAs should be made
Alternatives	The "realistic" number of wells that will drilled should be named in the EIS (current numbers are high)
Alternatives	Use Sunnyside/Bruin Point and Trail Canyon/Harmon Canyon to access the Plateau
Alternatives	Use Wrinkle Road to Trail Canyon to Harman Canyon Route to access the Plateau
Alternatives	Reduce the number of wells for the proposal
Alternatives	Alternate routes to the Plateau should and can be developed
Alternatives	Limit number of wells to be drilled
Alternatives	No drilling within 10 miles of rock art
Alternatives	Multiple wells should be drilled from each pad
Alternatives	Require setbacks that would reduce noise in Desolation Canyon
Alternatives	Cross Nine Mile Canyon south of Cottonwood Canyon
Alternatives	Where there is a clear line of sight, most roads could have turnouts periodically rather than a two-lane road all the way into a well site.
Alternatives	Consider air transport as an alternative to travel through Nine Mile Canyon
Alternatives	Gate Canyon across the bench east to the Green River west bench lands, then south across the lower end of Nine Mile Canyon Creek bed to connect with the West Tavaputs Plateau.
Alternatives	A new industrial road could be constructed to connect with the Sand Wash Road
Alternatives	Another route possibility is to build an industrial road from the gas field west over the plateau to join the Pine Canyon road that connects with east Wellington.
Alternatives	BLM must consider an alternative more consistent with the Price River MFP which requires delineation and protection of all wetlands, floodplains, and riparian areas in part by eliminating surface disturbing activities.
Alternatives	The Sunnyside-Bruin Point route
Alternatives	A road from the Uinta Basin along the Trail Canyon route.
Alternatives	The Dry canyon compressor station should be removed from Nine Mile Canyon and established on top of the Plateau following recommendations made by many reviewers of the public documents.
Alternatives	BLM can and should encourage an alternative to prevent drilling on private parcels in Nine Mile Canyon
Bill Barrett Corporation	BBC is a good company
Bill Barrett Corporation	BBC has won awards for doing good work
Bill Barrett Corporation	BBC is invested in the communities it works in

Subject Matter	Comment
Bill Barrett Corporation	Did the seismic survey identify any areas that are no longer of interest to BBC which could possibly be classified as void of gas and will this be depicted in the EIS?
Bill Barrett Corporation	There needs to be full disclosure of all planned surface occupancy sites, including those planned for State and private properties.
BLM Issues	The BLM does not have the archeological expertise to needed to complete the EIS accurately
BLM Issues	The BLM is not credible in the eye of the public
BLM Issues	The BLM cannot put extractive efforts above sustained yield and conservation mandates
BLM Issues	BLM's multiple use mandate appears to be in conflict the goals and objectives identified for the project
BLM Issues	BLM needs to make sure they have enough personnel to properly oversee the proposed development
Conformance with Regulations and LUPs	NEPA and NHPA should be used to the fullest extent to protect the resources of the area
Conformance with Regulations and LUPs	The proposed development must be in conformance with the Land Use Plan or a proposed amendment to the Plan
Conformance with Regulations and LUPs	The BLM must amend the Land Use Plan to consider the proposed development
Conformance with Regulations and LUPs	The President's Energy Policy was developed without adequate NEPA and should not be used within the reasoning of the EIS
Conformance with Regulations and LUPs	FLPSMA directs land managers to promote multiple use of federal lands in a manner that will ensue sustained yields from natural
Conformance with Regulations and LUPs	Under NEPA, the agency is obligated to consider connected actions as defined by the regulations implementing NEPA, similarly, these regulations specify that an action may not be segmented to avoid significance.
Conformance with Regulations and LUPs	Simply stating that impacts will be avoided or mitigated by the use of proper techniques and best management practices is not
Conformance with Regulations and LUPs	Authorization of the project would violate the Unnecessary and Undue Degradation Clause
Cooperating Agencies	Carbon County expects to be apprised of all pertinent information
Cooperating Agencies	All potentially impacted tribes need to be contacted and consulted with: Northern Ute, Southern Ute, Paiute, Goshute, Navajo, Hopi, Zuni, Shoshone, all ancestral puebloans
Cooperating Agencies	The Nine Mile Canyon Coalition should be named as a consulting party in the Section 106 process
Cultural Resources	Loss of/Damage to rock art
Cultural Resources	Concern for Rock art in Nine Mile Canyon
Cultural Resources	Move rock art to a museum
Cultural Resources	Impacts (indirect, direct, and cumulative) to world-renowned petroglyphs, pre-historic habitation and historic resources, and Nine-Mile Canyon
Cultural Resources	Alternatives need to be developed to avoid, mitigate and minimize impacts to petroglyphs
Cultural Resources	Evaluation and discussion of impacts to the setting and context of cultural resources is required
Cultural Resources	Impact analysis of and the significance of thousands of petroglyphs and the cultural landscape of Nine Mile Canyon is required
Cultural Resources	Impacts to cultural resources will increase with the increase in access to the area and will include looting, vandalism, and unauthorized OHV use
Cultural Resources	Impacts to rock art: vibration, dust, chemical treatments (magnesium chloride) used to treat the road
Cultural Resources	Noise will take away from the cultural and religious value of the petroglyphs
Cultural Resources	Infrastructure will negatively impact cultural and historic landscape
Cultural Resources	The lack of surveys completed in the area contributes to a lack of understanding of the landscape level of cultural resources.

Subject Matter	Comment
Cultural Resources	Block surveys need to be completed throughout the entire project area
Cultural Resources	Tribes need to be consulted with regarding traditional cultural properties and other concerns
Cultural Resources	BLM has, in the past, not been in compliance with NHPA responsibilities, therefore concern for historic and cultural properties in the Project Area is high
Cultural Resources	The BLM needs to reconcile the proposed development with the SRCMA protection and preservation measures in the EIS.
Cultural Resources	Nationally and internationally significant resources are at risk
Cultural Resources	Landscape level changes and impacts need to be considered for Nine Mile Canyon and West Tavaputs Plateau
Cultural Resources	Imagery and ambience of the cultural resources will be destroyed
Cultural Resources	This reservoir of cultural artifacts is so rare that we can not afford to damage or destroy it.
Cultural Resources	The serenity and timelessness of the location will be altered due to the proposed development
Cultural Resources	Alteration and impacts to cultural and historic resources will be permanent and the resources are irretrievable.
Cultural Resources	The natural value of the cultural sites exceed that of the oil and gas resources
Cultural Resources	The study and analysis of impacts to rock art related to dust, vibration from traffic, dust suppression chemicals, paving, and vehicle exhaust need to be completed and included in the EIS
Cultural Resources	Increased site awareness will lead to increased traffic and use and increased negative impacts. Protection will be necessary
Cultural Resources	The historic value of the Nine Mile Canyon is irreplaceable and invaluable
Cultural Resources	Monitoring of impacts to the resources should be conducted throughout the life of the project
Cultural Resources	It's too late to preserve the resources, they have already been compromised
Cultural Resources	The spiritual quality of the area will be lost
Cultural Resources	Clarity of rock art will be altered
Cultural Resources	Dust suppression measures should be safe for rock art
Cultural Resources	Dusting of rock art will occur and artificial cleaning of these cultural resources is not acceptable.
Cultural Resources	The archeological, cultural and other resources in and around Nine Mile Canyon must be safeguarded as energy development proceeds.
Cultural Resources	Survey methods adequate in scope to recognize archeological resources at risk of destruction should be performed.
Cultural Resources	An effective road dust abatement methods that will ensure control in light of projected large road traffic volume increases must be adopted.
Cultural Resources	A formal commitment to employ adaptive management methods and unambiguous guidelines regarding cultural resource protection must be adopted by BLM managers.
Cultural Resources	Because there is little scientific data regarding the potential impacts to rock art from dust, etc. the burden falls on BBC to actively protect these assets.
Cultural Resources	Development in the Nine Mile Canyon has the potential to destroy valuable cultural resources.
Cultural Resources	Tribal members should make the determination if there are religious sites within the area.
Cultural Resources	Consider cultural sites as they are an important testimony to the first peoples of North America.
Cultural Resources	The project would result in increased visitation by persons without education in the area of cultural resource protection.

Subject Matter	Comment
Cultural Resources	It is not in the best interest of the usage of these public lands to allow the BBC to expand its drilling area into this culturally rich area of United States history. To do so would undoubtedly destroy some of these public treasures that could never be replaced.
Cultural Resources	The American Rock Art Research Association would be willing to partner with the BLM
Cultural Resources	Studies have shown magnesium chloride adheres to rock surfaces which may impact rock art.
Cultural Resources	Who represents the Fremont Indians? Whose ancestors are they? Will these people be involved, consulted, respected in the study?
Cultural Resources	Are there to be the world's foremost anthropologists or experts in petroglyph art included?
Cultural Resources	Please go view the canyon and request everyone on the committee do so.
Cultural Resources	BLM should name the Nine Mile Canyon Coalition as a consulting party in the Section 106 process.
Cultural Resources	While the archeologist hired by the BBC is professional and competent, he still is employed by the BBC and therefore is not in a
Cultural Resources	The commitment to the nomination and listing of Nine Mile Canyon the NRHP long predates aggressive gas development that requires this EIS.
Cultural Resources	A study of the visual clarity of the rock art, including a plan for frequent and scheduled monitoring with the aid of photometry or similar technology needs to be conducted.
Cultural Resources	A full study of chemicals (magnesium chloride, calcium chloride, and other road bonding agents) and industrial pollutants on rock art, cultural sites, and historic properties needs to be conducted.
Cultural Resources	Rock art surface seismic testing as related to traffic disturbance and drilling operations needs to be completed.
Cultural Resources	Vibrations are causing rockslides that could damage irreplaceable rock art and cultural resources.
Cultural Resources	Conduct a thorough, quantitative block survey of the entire project area to establish a complete inventory of cultural sites and rock art including throughout Nine Mile Canyon and its tributaries, along roadways, all levels of strata, and the three affected mesas.
Cultural Resources	Native American religious concerns were not identified as an issue or concern in the NOI
Cultural Resources	Professional studies conducted on archeology of the Nine Mile Canyon need to be cited
Cumulative Impacts	Cumulative impacts need to be analyzed realistically
Cumulative Impacts	The Price and Vernal field offices aren't regulating the cumulative affects of oil and gas development
Cumulative Impacts	Cumulative impacts should include oil and gas development in the region including private and state lands
Cumulative Impacts	All projects within the Green River Basin should be addressed for cumulative impacts
EIS/Document Preparation	Since BBC's proposal is on public land shouldn't BLM choose the preparing party?
EIS/Document Preparation	BBC should inform the BLM and public of all plans to develop at this time, not project by project
EIS/Document Preparation	BBC will be preparing the document and will be biased
EIS/Document Preparation	The EIS is being proponent prepared, Buys and Associates has been a BBC contractor for years
EIS/Document Preparation	Buys and Associates is biased, it is a conflict of interest for them to prepare the EIS
EIS/Document Preparation	This EA is so lacking that an environmental statement should be done by qualified professionals
Health and Safety	Tourists using the Nine Mile Canyon for rock art viewing will be in danger on the road due to the proposed heavy truck traffic
Health and Safety	What emergency services will be called in the event of an accident?

Subject Matter	Comment
Health and Safety	Who will provide law enforcement in the Canyon?
Health and Safety	Speed limits are not adhered to by employees in the Canyon
Health and Safety	The nature of Nine Mile Canyon Road is not safe for heavy truck traffic and tourism use
Health and Safety	The EIS needs to explain the likelihood of spills, waste disposal plans, and fluids (including toxicity) that may be used for drilling
Health and Safety	Increased accidents due to increased traffic
Health and Safety	Dust generated from vehicle traffic is a health risk for people and animals in the canyons and along the roads
Health and Safety	Risks to workers from having to erect and take down drill rigs twice a year due to seasonal restrictions
Health and Safety	Need a constant presence there to enforce the speed limit and watch for any vandalism
Health and Safety	Tourists make sudden and unexpected stops when rock art is spotted. They walk down the road...while paying little or no attention to traffic.
Health and Safety	The narrow, winding road with its countless blind corners is hazardous enough without the added risk posed by the addition of large and less maneuverable industrial equipment.
Health and Safety	How will emergency services be contacted in case of an accident.
Health and Safety	BLM must address the probability of a spill or leak during the drilling process and should also evaluate the probability of a spill or leak over the lifespan of the wells, if they prove productive.
Health and Safety	The BLM must examine how the ecosystem would be affected if a spill or leak occurred and what sorts of clean-up measures would be available.
Health and Safety	Potential health hazards for people with heart conditions, asthma, and lung ailments would result from peak dust concentrations generated by the project
Health and Safety	Salt loading will result from the development
Land Use	The value of Nine Mile Canyon, it's rock art and the wilderness areas surrounding it are too valuable, oil and gas development should not be allowed nor should it outweigh the other resources
Land Use	Multiple use must have a fair balance
Land Use	O&G drilling will exclude and diminish all other uses
Land Use	Energy development is being given priority over other natural resources
Land Use	The educational value of the area will be lost if it's developed for oil and gas extraction
Land Use	The proposed action will lead to a variety of impacts that will effectively foreclose certain future land management options (i.e. designation of wilderness study areas, designation of the Nine Mile Canyon as a National Historic District, and designation of various areas of critical environmental concern). This is not allowed when the BLM is in the midst of a land use planning process.
Leases/Lease Rights	Why does the BLM consider the lease rights that have not gone into production after 10 years still valid?
Leases/Lease Rights	Disclose the terms, conditions and stipulations of the leases that apply to the proposed development
Leases/Lease Rights	Rescind leases in WSAs and in crucial or critical wildlife habitat
Leases/Lease Rights	Do not sell permits for oil and gas development in wilderness areas
Monitoring	Monitoring should be done for air quality, water quality, noise, wildlife, and vegetation

Subject Matter	Comment
Nine-Mile Canyon	Because Nine Mile Canyon is not part of the Federal government's purview, the commenter feels that it is not appropriate for the BLM to base any alternatives or decisions in the EIS from findings through the scoping process pertaining to the use or condition of this route.
Nine-Mile Canyon	The EIS process will be easier if the management of Nine Mile Canyon is left to the County and kept out of the EIS
Nine-Mile Canyon	Carbon County will manage this route
Nine-Mile Canyon	Nine Mile Canyon will not be able to sustain the level of development associated with the proposed use nor that of the reasonably foreseeable development
Nine-Mile Canyon	An alternative needs to be developed that does not include the use of Nine Mile Canyon; Sunnyside Road.
Nine-Mile Canyon	Impacts to the Nine Mile Canyon will be devastating
Nine-Mile Canyon	BLM should complete the action on the Nine Mile Canyon Historic District prior to the EIS and should be discussed in the EIS
Nine-Mile Canyon	BLM should designate the Nine Mile Canyon National Register District before considering the proposed action
Nine-Mile Canyon	Nine Mile Canyon should be a historical, cultural and archeological National Park
Nine-Mile Canyon	Nine Mile Canyon should qualify as a World Heritage site.
Nine-Mile Canyon	Nine Mile Canyon is a Scenic Byway and development should not be allowed here
Nine-Mile Canyon	Nine Mile canyon should be preserved and development should be re-routed
Nine-Mile Canyon	The nature of Nine Mile Canyon Road is not safe for heavy truck traffic and tourism use
Nine-Mile Canyon	Past industrialization and use of Nine Mile has led to damage
Nine-Mile Canyon	Additional law enforcement will be needed
Nine-Mile Canyon	The proposed field development is inconsistent with the area's special status under the SRCMA Plan
Nine-Mile Canyon	The vast majority of the development will not be in or near Nine Mile Canyon.
Nine-Mile Canyon	The BLM should support the nomination of Nine Mile Canyon to the NRHP and the EIS should state this goal
Noise	Compressor stations will be loud
Noise	Compressor stations should be not be allowed in Nine Mile Canyon or on the West Tavaputs Plateau
Noise	Increased noise in the area will change its character and diminish solitude
Noise	Industrial vehicle noise levels are extremely distracting to visitors.
Oil & Gas Development	Drill somewhere else
Oil & Gas Development	Year-round drilling should be allowed with resources protection measures
Oil & Gas Development	There are not enough oil and gas reserves in the West, in comparison to need and to reserves in other countries, to warrant drilling
Oil & Gas Development	No seasonal restrictions should be allowed
Oil & Gas Development	Lessees are not being charged adequately for the resources they are leasing
Oil & Gas Development	Renewable alternative energy should be developed instead of drilling for oil and gas
Oil & Gas Development	Explosives should not be used in the area for construction of the project
Oil & Gas Development	Natural gas should be allowed but not at the cost of other resources
Oil & Gas Development	The company does not have the unqualified right to drill on their leases
Oil & Gas Development	All drilling sites should be identified in the EIS

Subject Matter	Comment
Oil & Gas Development	The national need for stable and viable natural gas should be presented
Oil & Gas Development	Directional drilling should and can be used
Oil & Gas Development	Flareless completions should and can be done
Oil & Gas Development	Rocky Mountain natural gas reserves are important for future energy supplies and to sustain our comfortable way of life
Oil & Gas Development	The EIS should be approved quickly to respond to the President's Energy Plan, the energy crisis, and to help reduce the cost of gas
Oil & Gas Development	Only cost efficient measures that allow for full gas recovery should be allowed as mitigation
Oil & Gas Development	Local government officials support oil and gas development as well as this project
Oil & Gas Development	The demand for natural gas is growing and is projected to continue to grow, we must increase the supply to meet the demand
Oil & Gas Development	The national energy crisis needs to be addressed, as well as the impact this project would have in alleviating the crisis
Oil & Gas Development	If we do not develop natural gas resources other, less clean, resources will be used
Oil & Gas Development	The proposed development and associated infrastructure will industrialize the area, changing its character
Oil & Gas Development	Oil and gas development has been and continues to be an important factor in Utah's economic stability
Pipeline Construction	Pipelines should be placed on the surface to reduce surface disturbance
Public Involvement	Please post all maps on the website so the public can review them
Quality of Life	Environmental quality and quality of life in the area will be impacted
Range Management	Oil and gas development will compromise the ability of ranchers to raise healthy livestock
Recreation	Compressor stations will diminished the recreation experience (viewing rock art)
Recreation	Increase risk to visitors due to increase in traffic
Recreation	Noise will diminish recreating opportunities
Recreation	BBC should be required to work with the recreationists to reduce conflicts
Recreation	The recreation opportunities in the area will be diminished or limited
Recreation	Hunting and opportunities to hunt will be diminished or limited
Recreation	Industrial ongoing traffic will diminish the experience
Recreation	Tourists using the Nine Mile Canyon for rock art viewing will be in danger on the road due to the proposed heavy truck traffic
Recreation	The recreation experience on the Green River will be negatively impacted
Recreation	Increased noise in the area will change its character and diminish solitude
Recreation	Impacts to Dinosaur National Park should be considered
Recreation	The Nine Mile Canyon is utilized for viewing cultural sites in their natural landscape context, heritage tourism, and watchable wildlife. It is a regional attraction. This recreation experience will be impacted by noise, dust, heavy truck traffic and a diminished viewshed.
Riparian Areas	Riparian areas will be impacted and will, in turn, impact wildlife, livestock and fish
Roadless Areas	Do not allow drilling in roadless areas
Socioeconomics	Winter drilling will benefit the County and rural area
Socioeconomics	Socio-economic benefits will outweigh the costs

Subject Matter	Comment
Socioeconomics	Year-round drilling should be allowed
Socioeconomics	Utah should receive revenue from the drilling
Socioeconomics	The increase in job and revenue should be addressed in full
Socioeconomics	Tourism in the area will decrease due to oil and gas development
Socioeconomics	Hunting and opportunities to hunt will be diminished or limited
Socioeconomics	A socioeconomic impact study should be completed
Socioeconomics	Oil and gas development benefits the local community
Socioeconomics	Year-round drilling has the potential to reduce problems with drugs and crime by creating a permanent and stable work force.
Socioeconomics	The W. Tavaputs project has the potential to rejuvenate communities.
Socioeconomics	The project supports the President's Energy plan and the new energy bill.
Socioeconomics	Loss of tourism due to degraded experiences will have a negative economic impact on the region.
Socioeconomics	It is critical that the alternatives address the energy crisis affecting the nation at this time.
Socioeconomics	Mitigation measures and seasonal restrictions are an economic cost to the project that should be considered in monetary terms.
Socioeconomics	Existing Eastern Utah enterprises need the economic support that 700 wells would certainly bring.
Socioeconomics	The hotel industry will flourish with additional development
Socioeconomics	Look at how the project will affect each town in the project area
Socioeconomics	Look at how the multiplier effect will benefit the numerous communities in Eastern Utah
Socioeconomics	How much will rural Utah receive by way of taxes, royalties, direct sales, property taxes, etc.?
Socioeconomics	An economic analysis of visitors to the canyon needs to be done.
Socioeconomics	Community/small businesses in the region will benefit from the proposed oil and gas development
Socioeconomics	The price volatility of natural gas should be considered
Socioeconomics	This project supports the governor's efforts to rejuvenate the rural communities of Utah
Soils	Topsoil removal is an issue
Soils	Erosion will lead to siltation
Soils	Biological soil crusts will be damaged
Soils	Erosion control will be necessary
Soils	The effectiveness of mitigation measures for reducing impacts to soils should be studied and presented
Soils	Caravans of heavy transportation vehicles create simultaneous harmonics and vibrations which travel from wall to wall via the alluvial fill. Over time this may impact characteristics of the valley floor through subsurface differential settlement altering the permeability of the alluvial beds as well as the uncertain stability of the canyon walls. This needs to be addressed.
Soils	There have been rockslides located in the canyon that were not there three years ago
Soils	The watershed of the West Tavaputs Plateau is particularly vulnerable to erosion and sedimentation
Soils	The use of wood pads for drilling should be considered to reduce topsoil removal
Soils	Recent rockslides indicate that the soil is not stable within the area
TEC and Sensitive Species	Existing surveys are not sufficient for

Subject Matter	Comment
TEC and Sensitive Species	No negative impacts to T&E species should result from the development
TEC and Sensitive Species	Mitigation measures to protect the species must be followed
TEC and Sensitive Species	Increased roads will lead to increased use by people and therefore negative impacts to T&E
TEC and Sensitive Species	A full biological assessment should be completed
TEC and Sensitive Species	Sensitive species such as Graham's penstemon need to be considered
TEC and Sensitive Species	Impacts to Mexican spotted owl habitat
TEC and Sensitive Species	A survey of the entire project area should be completed for sage grouse
TEC and Sensitive Species	Year round drilling would lead to fewer trucks and rigs on the roads and less stress on wildlife and the environment
TEC and Sensitive Species	A full inventory of all the wildlife species as well as plant life need to be carefully thought about.
Traffic	Increased traffic will ruin rock art
Traffic	Increased traffic will upset people
Traffic	Industrial ongoing traffic will change the area
Traffic	Tourists using the Nine Mile Canyon for rock art viewing will be in danger on the road due to the proposed heavy truck traffic
Traffic	Year-round drilling would ease traffic pressures.
Traffic	Nine mile canyon was not designed for the proposed traffic levels.
Traffic	Roadside signs, flagmen, barricades and dust control will likely be ineffective
Traffic	An analysis needs to be done on accident rates due to increased traffic
Traffic	Has the BLM done traffic studies (i.e. at Gate Canyon) to determine actual traffic counts?
Traffic	Traffic impacts on tourist visitation, residential and ranching operations, hunting activities, and special designations must be examined.
Traffic	Impacts from thousands of truck trips on roads can not be mitigated by signs, flagmen, and barricades
Transportation	There will be conflicts between tourists/recreationists and heavy traffic and heavy-truck traffic
Transportation	Motorized recreationists may venture onto roads for the proposed development and may get hurt, signs need to be posted to alert motorists
Transportation	A kiosk providing public education/information should be available for the public
Transportation	Some roads should be closed to the public and some should be left open.
Transportation	Proposed roads could be used as wildlife observation sites
Transportation	Roads should be maintained during the project by the lease holders
Transportation	Access road will be illegally accessed and will result in negative impacts
Transportation	Increased roads will lead to increased use, both legally and illegally
Transportation	Road standards should be put in place
Transportation	Additional traffic in Duchesne County should be addressed
Transportation	The operator should pay for and complete maintenance on roads
Transportation	Increased potential for accidents due to increased traffic
Transportation	A Travel Plan should be developed
Transportation	Increased law enforcement will be needed on the roads

Subject Matter	Comment
Transportation	Improvements to existing roads should be addressed
Transportation	Roads should only be built on the plateaus, set back from the canyon edges
Transportation	Roads should be paved to decrease dust
Transportation	The extreme close proximity to the resources should be disclosed and analyzed in the EIS
Transportation	Massive dust suppression will be needed
Transportation	No new roads should be built, only existing roads should be used
Transportation	Excessive speeds lead to accidents on the roads.
Transportation	Identify and pave crucial sections of road and consider alternative surface seals for other sections if not paving the entire by-way
Transportation	The current roads are not designed for heavy truck traffic
Transportation	Roads have inadequate drainage, poor surfaces, base and subbase materials.
Transportation	An impact tax and a dedicated percentage of royalties should be required to help maintain the existing access roads.
Transportation	All improvements of roads should be done by design - not simply widened and straightened which would likely increase speed.
Transportation	The road disturbance acreage must be included in all impact analysis.
Transportation	Industry (drilling, maintenance, extraction, etc.) personnel should be trained on courtesy, yielding, etc. while traveling upon the roadway in Nine Mile Canyon.
Transportation	Publicized numbers of truck traffic have thus far been inadequate
Transportation	The imposed 25 mph speed limit bares no validity toward holding the dust plumes down
Transportation	Need full and realistic disclosure of the number of expected industrial commutes through the canyon on a daily basis
Transportation	The backcountry byway designation alone should prevent the road from being used for such extensive industrial purposes.
Transportation	Swaths of vegetation removed for buried pipelines could become routes for motor vehicles.
Vegetation/Plant Life	Vegetation, crops and plants will be impacted due to dust, pollution, and chemical treatment on the roads
Vegetation/Plant Life	Noxious and invasive weeds will spread and be an issue
Vegetation/Plant Life	Noxious and invasive weeds will devastate natural communities
Vegetation/Plant Life	Noxious and invasive weeds will alter fuel loading and fire patterns
Vegetation/Plant Life	Potential reclamation success for the area is not known and should be studied
Vegetation/Plant Life	Immediate re-vegetation should be required leaving only a tire track disturbance for future monitoring
Vegetation/Plant Life	Will BBC be re-addressing any of the reclaimed areas that may have been damaged by high water of last year?
Vegetation/Plant Life	A full inventory of all the wildlife species as well as plant life need to be carefully thought about.
Vegetation/Plant Life	Poor soils indicate the possibility of reclamation project failure.
Visual Resources	Compressor stations should be not be allowed in Nine Mile Canyon or on the West Tavaputs Plateau
Visual Resources	Compressor stations should be consolidated and camouflaged
Visual Resources	Compressor stations should be removed at the completion of the project
Visual Resources	A better system for camouflaging surface facilities should be developed
Visual Resources	Viewsheds will be impacted and diminished
Visual Resources	Diminished air quality will impede the views

Subject Matter	Comment
Visual Resources	The viewsheds of Nine Mile and associated canyons are being compromised by unimproved roads
Visual Resources	The Dry Canyon compressor station has become more than incidental to the viewshed - conditional use permits and/or variances granted have totally ignored Visual Resource Management practices.
Visual Resources	Once a gas well is under production, immediate re-vegetation should be required leaving only a tire track disturbance for future monitoring
Visual Resources	The areas where underground work have gone on are an eyesore and will take dozens of years to be less visible in that climate
Visual Resources	The effects of industry on historic and prehistoric viewsheds must be analyzed.
Visual Resources	The canyon has lost much of its ambiance of natural beauty and historical and pre-historical character due to industrialization.
Water Resources	Surface water features (springs, creeks, streams) need to be protected
Water Resources	Water quality will be affected due to development, both in the project area and downstream
Water Resources	Where will the water come from for a project of this magnitude?
Water Resources	Water quality will need to be analyzed prior to the start of the project and should be monitored throughout the life of the project
Water Resources	In case of contamination, what will landowners and wildlife do?
Water Resources	Will BBC be held responsible for water contamination?
Water Resources	Hydraulic fracturing of rock/formations for drilling may impact groundwater
Water Resources	Altered streamflow and sedimentation will occur
Water Resources	Water will be polluted and reduce in quality due to the development
Water Resources	The Green River will be impacted
Water Resources	A full inventory of wells, springs, and seeps should be completed
Water Resources	Need to address the ecological effects of using water resources for dust suppression.
Water Resources	Green River drainage helps to serve millions of downstream consumers.
Water Resources	How will the Probable Hydrologic Consequences of the drilling project in its entirety be ascertained?
Water Resources	When was the last Seep and Spring Inventory completed and when can an update be expected?
Water Resources	What monitoring frequency will be required for the seeps and springs and perennial streams?
Water Resources	What is the pattern of perennial stream flows over time?
Water Resources	What are the projected downstream sediment load totals? Also during a 100 year flood event.
Water Resources	What are the parameters for ground water quality, TDS, pH, Fe(Tot) and Mn(Tot) also for surface water quality, flow, TDS, TSS, pH, Fe(Tot), Mn(Tot)?
Water Resources	Is Oil and Grease to be included in the Surface Water Quality parameters?
Water Resources	Will a complete Water Rights Summary be included in the EIS?
Water Resources	There is a crossing failure, stream alternation, piles of water, scattered construction materials and frequent sediment flow into Nine Mile Creek at the Dry Canyon Compressor station site.
Water Resources	The watershed quality that affects Nine Mile Creek will need regular and frequent monitoring.
Water Resources	No surface or groundwater baseline data has been made available to the public.

Subject Matter	Comment
Water Resources	In areas where Mag-Chloride has been used so heavily it has caused places of point source discharge into Nine Mile Creek and is a compounding contributor to the salinity problem of the Green and Colorado Rivers.
Water Resources	Where are condensate and/or produced water disposal wells located in relation to Nine Mile Canyon?
Water Resources	Agricultural water shares used for dust suppression applications and drilling gas wells are being used for non-agricultural purposes.
Water Resources	The project would result in permanent damage to and loss of waters of the United States . Thus a 404 permit is required.
Water Resources	The project does not conform to various measures designed to protect wetlands and water courses.
Water Resources	Already Nine Mile Creek and its tributaries are currently not meeting their beneficial uses for temperature, and the project will exacerbate this non-compliance with state water quality standards
Water Resources	The Utah Division of Water Quality must be involved in the process particularly because DWQ must determine whether it will certify the project under Section 401 of the Clean Water Act.
Water Resources	The agency must show that its mitigation measures for the protection of wetlands, streams, aquatic habitat, and water quality are founded on credible, non-speculative data and that they will be effective in their specific application.
Water Resources	Citing the 303(d) list is not an adequate basis for claiming that a water is meeting water quality standards, not all waters have been assessed.
Water Resources	The ecological impact of removing large amounts of water during a drought for dust suppression need to be analyzed
Water Resources	All regulatory actions related to water and water use need to be identified
Water Resources	Potential impacts to drinking water sources need to be addressed
Water Resources	No development should occur within the 100-year floodplain
Water Resources	A stormwater management plan must be implemented
Water Resources	The State of Utah has designated several stream segments within the Green River drainage as Category 1 High Quality Waters, which are subject to an enhanced anti-degradation standard
Wild and Scenic Rivers	The proposed action will impact the eligibility of Nine Mile Creek to be designated as a Wild and Scenic River
Wilderness Characteristics, WIAs, WSAs	The EIS should discuss wilderness characteristics in detail
Wilderness Characteristics, WIAs, WSAs	All areas found to possess wilderness characteristics (Desolation and Jacks Canyon) should be made Wilderness Study Areas
Wilderness Characteristics, WIAs, WSAs	Wells should not be allowed in Wilderness Inventory Areas.
Wilderness Characteristics, WIAs, WSAs	Wells and roads should not be allowed in Wilderness Study Areas
Wilderness Characteristics, WIAs, WSAs	Wilderness qualities will be impaired
Wilderness Characteristics, WIAs, WSAs	Increased roads will lead to increased use by people and therefore negative impacts to wilderness areas
Wilderness Characteristics, WIAs, WSAs	Keep development off the edges of the plateau to reduce impacts
Wilderness Characteristics, WIAs, WSAs	WIAs should not be considered wilderness
Wilderness Characteristics, WIAs, WSAs	Drilling should be allowed in WSAs
Wilderness Characteristics, WIAs, WSAs	Fragile ecosystems in the wilderness will be impacted
Wildlife	Winter restrictions are unnecessary for wildlife
Wildlife	The need for drilling outweighs the need for wildlife timing restrictions
Wildlife	Scientific data should be presented to substantiate reasons for timing restrictions and mitigation

Subject Matter	Comment
Wildlife	Wells should not be allowed in crucial and critical habitat for wildlife including Sage grouse, bighorn sheep, elk, deer and wild horses.
Wildlife	Restrictions for bighorn sheep and Sage grouse should be required
Wildlife	Allow lease holders to complete habitat improvements including the addition of water troughs
Wildlife	Allow lease holders and agencies to provide assistance to wildlife during hard winters
Wildlife	Impacts to water resources will negatively impact wildlife
Wildlife	Critical habitat for elk, deer and bighorn sheep will be negatively impacted
Wildlife	Increased roads will lead to increased use by people and therefore negative impacts to wildlife
Wildlife	Because the continuous habitat for wildlife will be impacted, specie diversity will decrease and the value of the habitat will be diminished
Wildlife	Increased accessibility to area will diminish the quality of the habitat
Wildlife	The area is rare in terms of value to wildlife due to the current quality of habitat
Wildlife	Monitoring of impacts to habitat and wildlife should be conducted before the project starts and throughout the life of the project
Wildlife	A study of impacts to wildlife associated with oil and gas development should be completed prior to the approval of the project
Wildlife	The Tavaputs plateau has long been recognized as one of the most isolated and pristine areas of the state and has provided incredible, unbroken habitat for an abundance of wildlife.
Wildlife	The plateau area represents the highest diversity and concentration of animal species in Utah.
Wildlife	Data on species diversity and population numbers should be compiled before the project begins and, as always, closely monitored thereafter.
Wildlife	Need to analyze the consequences the project will have on species migration/range, food resources and reproductive cycles
Wildlife	Wildlife would be threatened if the water sources are altered, or caused to be altered in flow or quality
Wildlife	Impacts to aquatic life could include increased temperatures, sedimentation, and erosion and changes to the stream channel as well as the increases in other criteria pollutants
Wildlife	The EIS should identify the extent of impacts on the fish and other aquatic life from water depletion or water quality impacts
Wildlife	There is no tangible evidence that seasonal stipulations benefit wildlife
Wildlife	Winter drilling can help wildlife and the environment
Wildlife	Seasonal restrictions are arbitrary and based on speculative science
Wildlife	Because development is proposed within critical habitat, habitat enhancement of an equivalent acreage must be completed by BBC
Workforce	Carpooling and bussing of workers should be considered